

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Joseph Higgins,	:	JURY TRIAL DEMANDED
	:	
Plaintiff	:	CIVIL ACTION – LAW
	:	
vs.	:	(Judge A. Richard Caputo)
	:	
Gruma Corporation, Tecno Maiz, S.A. de	:	Docket No.: 3:09 CV 01439
C.V., Gruma S.A.B. de C.V.,	:	
	:	
Defendants	:	Electronically Filed

.....

DEFENDANT GRUMA CORPORATION'S LIST OF UNDISPUTED FACTS

NOW COMES, the Defendant, Gruma Corporation by and through its attorneys, Thomas J. Kelley & Associates by Thomas J. Kelley, Esquire, and files its list of undisputed facts and avers as follows:

1. Plaintiff, Joseph Higgins was injured in the course and scope of his employment on October 3, 2007.
2. At the time of the accident, Plaintiff was employed by Gruma Corporation located at 1159 Cottonwood Lane, Irving, TX 75038.
3. As the result of injuries alleged sustained in the accident, Plaintiff received workers' compensation benefits through Gruma Corporation consisting of both indemnity and medical benefits.

LAW OFFICES OF THOMAS J. KELLEY

/s/ Thomas J. Kelley, Esquire
Thomas J. Kelley, Esquire
50 Glenmaura National Boulevard
Moosic, PA 18507
(570) 343-6570; (570) 343-5183 (fax)
tkelley@travelers.com
ID No. 24777